Consumers Union

Publisher of Consumer Reports

Docket Management System
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Docket No. NHTSA-00-8296

CONSUMERS UNION COMMENTS
TO
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
ON
FEDERAL MOTOR VEHICLE SAFETY STANDARDS
TIRE IDENTIFICATION AND RECORDKEEPING
CONSUMER INFORMATION REGULATIONS

Consumers Union,[1] publisher of the magazine *Consumer Reports,* appreciates the opportunity to comment on the National Highway Traffic Safety Administration's Advance Notice of Proposed Rulemaking (ANPRM) on consumer information in tire identification and recordkeeping. We commend the agency's prompt compliance with the requirements of the Transportation Recall Enhancement, Accountability and Documentation Act (TREAD) passed during the last Congress. Among other mandates, TREAD directed NHTSA to develop a rule for improved tire labeling and identification in

[1] Consumers Union is a nonprofit membership organization chartered in 1936 under the laws of the state of New York to provide consumers with information, education and counsel about good, services, health and personal finance; and to initiate and cooperate with individual and group efforts to maintain and enhance the quality of life for consumers. Consumers Union's income is solely derived from the sale of *Consumer Reports,* its other publications and from noncommercial contributions, grants and fees. In addition to reports on Consumers Union's own product testing, *Consumer Reports* with more than 4 million paid circulation, regularly, carries articles on health, product safety, marketplace economics and legislative, judicial and regulatory actions which affect consumer welfare. Consumers Union's publications carry no advertising and receive no commercial support.

the aftermath of a recall program covering 6.5 million Firestone tires. In the midst of that recall, consumers reported having difficulty determining from both the information appearing on their tires and the placement of that information whether their tires were included in the recall. We believe that NHTSA's efforts to make information on the tires themselves more comprehensible to consumers, while directing consumers to the placards on their vehicles for additional important tire information, will improve public understanding of the range of tire-related safety issues, including vehicle load limits and proper inflation pressure.

Consumers Union starts from the belief, based on letters from our readers and requests from our on-line forums, that now more than ever consumers want information about their tires that is easy to understand and readily accessible. We believe that the public's appreciation for the importance of tires as an integral component of vehicle handling and vehicle safety was heightened as a result of the Firestone tire recall last year. That recall also underscored the importance of identifying tire types easily and quickly to determine whether they are subject to a recall.

Consumers Union has addressed below only those questions raised in the ANPRM about which it has knowledge, expertise, or experience. Our overriding concern is that NHTSA devise the most consumer-friendly tire labeling and information standards possible, while accomplishing those benefits through cost-effective means. We believe the main benefit of providing consumer-friendly information will be better informed consumers who are better able to protect themselves and their families, whether in day-to-day driving or during more urgent circumstances like a tire recall.

1) **D.O.T. MANUFACTURER ID AND DATE OF PRODUCTION INFORMATION:**

- NHTSA should return to the requirements of the terminated 1980 proposed rulemaking and make standard the placement of the DOT coded manufacturer ID and date of production information on both sidewalls for ease of locating and reading in recall situations.
- Much confusion exists in interpreting that information regardless of where it is located. We recommend that the manufacturer ID's 2 digit code should include this lettering above it, "Manuf. ID," in letters equal in size at least to those required for other lettering. The code with the date of manufacture should have these letters above it, "Prod. Date. ww/yy."
- Requiring that reflective or alternately colored rubber be used to differentiate these codes is not necessary if NHTSA mandates code placement on both sides of the tire in a consistent and prominent location.
- Based on our experience, current regulations requiring placement of tire information near the bead area protect that information from scuffing and abrasion. We recommend that these placement requirements be continued.

2) **TIRE LOAD INFORMATION:**

- The tire's maximum load capacity should be placed on the sidewall for easy reference when consumers need to replace that tire with others of comparable load capacity.
- The current numeric "Load Index" system is not intuitive to the consumer. Moreover, load index tables are not readily available to consumers for interpretation. Though load index should be maintained as a means of

reinforcing a tire's maximum load capability and whether it is a standard or extra load tire, the load index should be followed by the maximum load and inflation pressure values as are currently required (with both metric and english units). This will further serve to reinforce the connection between the two. CU also supports continuation of maximum tire inflation value because we believe it will help prevent overinflation of tires.

- Load range information, expressed either alphabetically (A,B,C…) or by the words Standard or Extra load, is not required as the load index and maximum load and inflation values sufficiently describe the loading capability.

3) INFLATION PRESSURE INFORMATION:

To differentiate a tire's correct operating inflation pressure from its maximum inflation pressure, additional wording in clear letters of 6 mm height or larger should appear on both sidewalls stating, "Cold Operating Pressure: Consult Vehicle Information." Ideally, this wording should follow the maximum inflation pressure.

4) SPEED RATING INFORMATION:

- The current speed rating coding (UTQG temperature rating and ECE alpha code appearing after the load index) is also not intuitive to consumers. Actual maximum speed limitations should be noted on the sidewall as, "Speed Capacity : XXX kph (XXX mph)." Wording such as "speed capacity" in lieu of "maximum speed" will also help to reinforce the importance of replacing tires with others of equal speed capability. Consumers should be advised that this is a tire characteristic, not a speed for their use in driving.

- Speed ratings should be assigned based on revised testing criteria for which tires are run, at least to the speed to which they are designated, for an extended period that simulates real world conditions.
- Speed rating information and UTQG Temperature rating are virtually redundant; both are assigned under a “high speed” test condition. UTQG Temperature grades could potentially be eliminated in lieu of the “speed capacity” information noted above.

5) TREADWEAR INFORMATION:

- CU continues to view UTQG Treadwear designation with skepticism. A tire’s assigned grade is more a marketing device than a true measure of treadwear. It requires calculation which provides only a comparison among tires, with no realistic measure of expected mileage. UTQG Treadwear grades should be eliminated in lieu of a sidewall statement like the following: “Expected Treadwear: XXXXXX km (XXXXX miles).” Other wording possibilities include: “Projected treadwear” or “Treadwear potential.” Such information tracks the current treadwear warranties assigned to many tires. Manufacturers need to reinforce with consumers the fact that treadwear predictions are very much dependent on driving conditions to which the tire is subjected as well as whether the tire has been maintained properly.
- Treadwear indicators could benefit from clearer sidewall identification. TWI (treadwear indicator) is a coded acronym that many consumers don’t understand. Treadwear indicators themselves should be continued, but may be more useful if they are identified by an arrow on the tire shoulder accompanied by the word

"WEAR" underneath each. Consumers would benefit if the following words appeared elsewhere on the sidewall, "Replace tire when worn to indicator."

6) UTQG TRACTION GRADES:

UTQG Traction grades are probably the most meaningful of the UTQG grades for the consumer, providing an indication of wet traction performance, which is useful regardless of geographical area. Traction grades should be continued and potentially expanded to include greater differentiation, through additional grades and expanded testing for snow, ice or mud traction capability.

7) MUD AND SNOW DESIGNATION:

Currently "Mud and Snow" designations are assigned based on a rubber-to-void ratio of the tread design and are not dictated by actual traction performance. Placement of the terms "Mud and Snow" on a tire's sidewall should be based on traction performance in those conditions. Otherwise, it should be eliminated.

8) UTQG TYPE GRADES:

Currently UTQG grading is required on only passenger tires of certain tread depth levels and is not required as standard for all tires designed for passenger vehicles. Any UTQG type grades that are mandated by a revised standard should apply to all tires designated for use on cars, SUVs, and pickups, including Passenger (P), Light Truck (LT) and winter tires.

9) CONSTRUCTION INFORMATION:

Current requirements to include information related to the number of plies and tire material are not of use to most consumers. Nevertheless, we believe they should be continued based on their value in the event of a defect investigation, analysis or recall.

10) TIRE TYPE:

Currently a number of tire types, including All-Season, All-Terrain, Highway, Winter and others are available for passenger vehicles, yet are identified only at the tire manufacturer's discretion, either in marketing information or by some indication in the tire name (AS, A/S, Touring). We recommend that NHTSA require the tire type be molded into a tire's sidewall. We think this would prove beneficial for consumers seeking to replace their tires with those of a similar type. This is particularly true with those vehicles that have a recommended specific tire type to maintain handling and performance characteristics.

Below are responses to several additional questions raised in NHTSA's ANPRM:

11) Is there any other information, eg., tire size or speed rating, that should be considered for the vehicle placard or label?

Currently a vehicle placard includes information on tire size, load index, speed rating information, and inflation pressures for that vehicle. This information should provide consumers with sufficient guidance for maintaining tires properly. This placard may not be the same one that has the vehicle weight information (gross vehicle weight or capacity weight on most vehicles). We recommend that information about a vehicle's payload (including an explanation of the term "payload") be added to an existing or separate placard for all vehicles. Otherwise, consumers have no way realistically to know whether they have overloaded their vehicle.

12) Do consumers read and correctly understand the information they are currently receiving? For example, do consumers understand the factors that contribute to tire failure, such as speed, inflation pressure and weight?

We can't say how many read and understand the information that is currently available. Judging from the widespread confusion during the Firestone tire recall of last year, the best answer is, not many. Data from a recent survey in the November 6, 2000 issue of *Tire Business* demonstrate that people don't check tire inflation as often as they should. The survey showed that 72% of vehicle owners had at least one underinflated tire. In this vein, we believe that consumers need much more clarity in the information supplied to correctly differentiate a tire's correct operating inflation pressure from its maximum inflation pressure. We therefore recommend that additional wording of uniform size and standard location appear on both sidewalls stating "cold operating pressure: consult vehicle information." Current statements regarding underinflation and overloading are inconsistent and often hard to read.

Education plays an important role in this regard. Even if the information on maximum tire load, speed capacity, and reference to the operating inflation pressure is all clearly in place on the tire, the interaction between them will still require explanation. Moreover, and most importantly, the consumer's main concern should be cold operating tire pressures and payload for the vehicle they are driving.

13) Do we know how consumers, when they load a light vehicle, determine whether the vehicle is capable of carrying that load?

The loading information is defined by the vehicle manufacturer and for each model and depends in part on vehicle options. Realistically, it cannot be part of the tire standards. The maximum load information on the tire itself does not let consumers know how much weight the vehicle is capable of carrying safely. We doubt that consumers have a clear understanding of vehicle payload capacity and believe they are guided mainly by how much will fit inside the vehicle. Indeed, they need to better understand that information about safely loading their vehicles cannot be found on their tires, and requires consulting the vehicle placard and/or owners manual.

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Respectfully submitted,

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